

remy green <remy@femmelaw.com>

Rodney - 22-cv-1445 - Discussion of Email/Text Search

remy green <remy@femmelaw.com>

Thu, Dec 7, 2023 at 11:09 AM

To: "Musso, Gregory (LAW)" <gmusso@law.nyc.gov> Cc: Protester Cases <Protests@femmelaw.com>

...it's not about superiors (although that's ALSO a problem). We need someone there who has knowledge about collection and review, as well as technological capability. (It's usually Anthony DiSenso)

It sounds like you haven't done much, if any, of the groundwork necessary to have this conversation seriously. But let's see how it goes, I guess.

Sent from a mobile device, please excuse any thumbling or stumbling.

J. Remy Green

Partner

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honorific / pronouns: Mx. / they, their, them	

On Dec 7, 2023, at 11:05 AM, Musso, Gregory (LAW) <gmusso@law.nyc.gov> wrote:

I will have a conversation with my superiors before the meeting.

From: remy green <remy@femmelaw.com>
Sent: Thursday, December 7, 2023 11:03 AM
To: Musso, Gregory (LAW) <gmusso@law.nyc.gov>
Cc: Protester Cases <Protests@femmelaw.com>

Subject: Re: [EXTERNAL] Re: Rodney - 22-cv-1445 - Discussion of Email/Text Search

Great. I will call you then. Should I loop in anyone else from your office, given the obvious need?

Sent from a mobile device, please excuse any thumbling or stumbling.

J. Remy Green

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| honorific / pronouns: Mx. / they, their, them |

On Dec 7, 2023, at 11:01 AM, Musso, Gregory (LAW) <gmusso@law.nyc.gov> wrote:

OK, lets do that

From: remy green <remy@femmelaw.com>
Sent: Thursday, December 7, 2023 10:45 AM
To: Musso, Gregory (LAW) <gmusso@law.nyc.gov>
Cc: Protester Cases <Protests@femmelaw.com>

Subject: Re: [EXTERNAL] Re: Rodney - 22-cv-1445 - Discussion of Email/Text Search

I have a vet appointment at 3, but could meet at 1:00 - 2:00.

J. Remy Green

Partner

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On Thu, Dec 7, 2023 at 10:44 AM Musso, Gregory (LAW) <gmusso@law.nyc.gov> wrote:

I have a busy morning today. Can we discuss this afternoon?

From: remy green <remy@femmelaw.com>
Sent: Thursday, December 7, 2023 10:43 AM
To: Musso, Gregory (LAW) <gmusso@law.nyc.gov>
Cc: Protester Cases <Protests@femmelaw.com>

Subject: [EXTERNAL] Re: Rodney - 22-cv-1445 - Discussion of Email/Text Search

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Hi Greg,

Following up on this.

J. Remy Green

Partner

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On Mon, Dec 4, 2023 at 12:24 PM remy green <remy@femmelaw.com> wrote:

Hi Greg,

Our deadline to discuss any proposed limitations on email searches, or to confer on methodology, is Friday. I would have expected to hear from you on this before today.

Are there any proposals you want to send us? We should probably schedule a meeting this week to actually discuss search terms -- ideally with someone from your office who is prepared both on the case itself and in having authority to actually discuss the substance of search terms.

Obviously, if Defendants fail to engage at all, that will be something we raise in our opposition.

Yours,

Remy.

J. Remy Green

Partner

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12/27/23, 3:59 PM	Case 1:22-cv-0144	15-LAKhନ୍ତିୟିୟ/en MaiGE	Richale (1255)-1345 Fibile (dssli ଥା/ ଅଞ୍ଜାପ ନ୍ଧି ଅନ୍ତାତ୍ୟ	5 of 5